

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Monsanto Company	AI #:	1096	TEMPO Activity No:	PER20070011
Facility Name:	GI Unit	Remarks Submitted by:	William C Rhodes		
Permit Writer:	Scott J. Templett	Permit Writer Email address:	Scott.Templett@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Criteria Pollutant Emission Rates	Emission rates for the following should be updated: EQT 0237, 0238, 0239, 0240, 0241, 0242, and FUG 0006	Made corrections to the emission rates as specified in the application.
TAP/HAP Emission Rates	Emission rates for the following should be updated: EQT 0237, 0238, 0239, 0240, 0241, 0242, and FUG 0006	Made corrections to the emission rates as specified in the application.
Statement of Basis	Emission rates should be changed to reflect revised totals	Emission rate totals have been updated on the Statement of Basis.
Briefing Sheet	Emission rates should be changed to reflect revised totals	Emission rate totals have been updated on the Briefing Sheet.
Briefing Sheet	Please add Caustic Tank 504 as an insignificant activity	The requested tank has been added to the insignificant activity list.
Briefing Sheet	Please add Water Treating Chemical Tanks as an insignificant activity line item	The requested entry for this group of tanks has been added to the insignificant activity list.
Inventories, pg 1	Please revise the volumes as follows: EQT 0237: 225,000 gallons EQT 0238: 150,000 gallons EQT 0242: 60,000 gallons	Tank volumes have been updated as requested.
Inventories, pg 10, 11	Emissions from EQT 0343 are controlled by EQT 0228, not by EQT 0224 and EQT 0225	Relationships have been corrected as requested.
Inventories, pg 12	Emissions from EQT 0344 are controlled by EQT 0229, not by EQT 0228	Relationships have been corrected as requested.

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Inventories, pg 17	Please delete the following as being controlled by EQT0567: EQT 0372, EQT 0381	Relationships have been corrected as requested.
Inventories, pg 17	Please add the following as being controlled by EQT0567: Tank No. 271 – Centrifuge Feed Tank 3 Tank No. 332 – Q-R TO Quench Tank	Relationships have been corrected as requested.
Inventories, pg 18	Emissions from EQT 0589 are controlled by EQT 0299, not by EQT 0598	Relationships have been corrected as requested.
Inventories, pg 18	Please add the following as being controlled by EQT 0598: EQT 0284, EQT 0291, EQT 0292, EQT 0293, EQT 0300, EQT 0322, EQT 0323, EQT 0336, EQT 0402, EQT 0403, EQT 0426, EQT 0427, EQT 0428, EQT 0429	Relationships have been corrected as requested.
Sp. Reqs. 15, 18, 183, 185	These specific requirements establish operating limits for the thermal oxidizers on an hourly average basis. In anticipation of the May 10, 2008 MON compliance date, we request that a “daily average” be established as the statistical basis for these limits.	The statistical basis has been updated as requested for these requirements.
Sp. Reqs. 19 and 186	These specific requirements directs Monsanto to establish a Startup, Shutdown, and Malfunction Plan for the Thermal Oxidizers as a State Only requirement. The MON regulations (which will take affect on May 10, 2008) will require Monsanto to establish a Startup, Shutdown, and Malfunction Plan for the entire GI Unit. Reference is 40 CFR 63.6(e)(3), via Table 12 to the MON. Monsanto suggests that either these specific requirements be modified to reflect this Federal Requirement, or that they be replaced with a single specific requirement in the GI-wide section since the requirement applies to the whole unit.	These requirements have been removed from the permit and have been replaced by a single requirement for the entire GI unit.
Sp. Req. 22	This specific requirement includes a lot of unnecessary information; its purpose was to establish an alternate temperature limit for the rare occasions when the feeds to TO 1 and TO 2 were combined into one TO. Suggest replacing it with: “When the emissions from Trains A, B, C, D, E, and F are all fed to either TO 1 or TO 2 (i.e., crossover mode), the affected TO shall operate with a minimum daily average exit gas temperature of 1800 F.”	This requirement has been reworded as requested.
Sp. Reqs. 39, 55, 70, 85, 101, 117, 146, 162, 170, 207	These specific requirements all establish a minimum pH limit for the scrubbers of 7.0. In anticipation of the May 10, 2008 MON compliance date, we request that a “daily average” be established as the statistical basis for these limits.	The statistical basis has been updated as requested for these requirements.
Sp. Reqs. 57 – 63	Fume Scrubber C is not subject to the MON; therefore these specific requirements should be deleted.	These requirements have been removed from the permit.
Sp. Req. 66	Fume Scrubber C has not been operated for a number of years; however, it may be returned to service at some point in the future. Therefore, we request that this specific requirement to conduct daily visual observations be clarified to state that this requirement only applies while the scrubber is in operation.	This requirement has been edited to include the language “while the scrubber is in operation”.

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Sp. Reqs. 72 – 78	Fume Scrubber D is not subject to the MON; therefore these specific requirements should be deleted.	These requirements have been removed from the permit.
Sp. Reqs. 164 – 168	The Formaldehyde Tank Scrubber is not subject to the MON; therefore these specific requirements should be deleted.	These requirements have been removed from the permit.
Sp. Reqs. 173, 177	These baghouses have not been operated for a number of years; however, they may be returned to service at some point in the future. Therefore, we request that these specific requirements to conduct daily visual observations be clarified to state that this requirement only applies while the baghouses are in operation.	This requirement has been edited to include the language "while the baghouse is in operation".
Sp. Req. 192	In accordance with 63.997 (c)(ii), we request that this specific requirement stipulate that the testing be conducted within 180 days of the scrubber's startup.	This requirement has been edited to include the requested language.
Sp. Req. 196	This scrubber will be started up after the compliance date; therefore, this specific requirement doesn't apply.	This requirement has been removed from the permit.
Sp. Req. 11	This specific requirement potentially could be interpreted as conflicting with specific requirement 19, because minor, short-term diversion of the thermal oxidizer feed to the process scrubber occurs during malfunctions. Therefore, we suggest that this specific requirement be re-worded to state that "Bypassing of the thermal oxidizers aside from situations included in the Startup, Shutdown, and Malfunction Plan are not allowed." The reporting provisions in the current specific requirement are not needed as the MON includes appropriate reporting provisions.	This requirement has been edited as requested.
Sp. Req. 189	This specific requirement potentially could be interpreted as conflicting with specific requirement 186, because the Startup, Shutdown, and Malfunction Plan details how the unit is to be operated during these conditions. Therefore, we believe that this specific requirement could be deleted. However, if it is retained, we suggest that it be re-worded to state that "When an emergency, unplanned shutdown, or shutdown necessary to conduct required maintenance operations on the thermal oxidizer occurs, permittee shall follow the provisions of the Startup, Shutdown, and Malfunction Plan."	This requirement has been edited to the language requested.
Sp. Reqs. 210 – 242	After the MON compliance date of May 10, 2008, its equipment leak provisions will apply. Our understanding is that LDEQ has proposed a rule stating that if a source is subject to a Federal MACT standard, any State-only MACT standards will no longer apply. As these specific requirements stem from the State-only Non-HON MACT, we are requesting that some type of mechanism be included in the permit to negate these specific requirements following the MON compliance date without the need for submitting a full permit modification application and the associated fee.	A statement was added to this requirement which states that the MON requirements (at the compliance date of the rule) supersede the Non-HON MACT requirements.

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Sp. Regt. 187	The regulatory reference to the Non-HON is 5109.A.2	Citation has been added along with a clarifying comment (as of December 20, 2007 final rule – AQ256SI)
Sp. Regt. 21	There is a minor typographical error – "let" should be "fed"	Corrected typographical error.
Sp. Regts. 19 and 186 in first permit draft	Monsanto had requested in our earlier technical review to modify or delete these requirements to establish a Startup, Shutdown, and Malfunction Plan since the MON will establish this requirement. However, Monsanto is requesting that these specific requirements be re-introduced into the permit to accommodate the time period between permit issuance and the MON Compliance Date.	Added these two comments back into the permit along with a clarifying statement that this requirement will be superseded by the MON at the compliance date of the MON.